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9 **GOYKO KUBUROVICH**

7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA-SAN JOSE DIVISION**

9 UNITED STATES OF AMERICA,)	CASE NO.: CR 16-00373-EJD
)	
10 Plaintiff,)	DEFENDANT GOYKO KUBUROVICH'S
)	OPPOSED EX PARTE REQUEST FOR
11 vs.)	EXTENSION OF TIME TO SURRENDER.
)	[PROPOSED ORDER]
12 GOYKO KUBUROVICH)	
13 et al.,)	CURRENT SURRENDER DATE: 10-10-19
)	EXTENSION REQUESTED: 12-9-19.
14 Defendants.)	

15
16 **EX-PARTE REQUEST FOR ORDER EXTENDING TIME TO SURRENDER:**

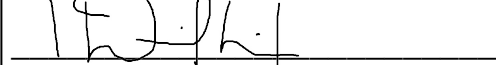
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18 Defendant, **GOYKO KUBUROVICH**, hereby submits this EX PARTE MOTION
19 TO EXTEND THE DATE DEFENDANT IS REQUIRED TO SURRENDER TO THE
20 BUREAU OF PRISONS to commence his sentence. **The United States of America has**
21 **indicated they OPPOSE this request.**

22 The current date defendant is required to surrender being October 10, 2019,
23 defendant asks that date be extended to December 9, 2019. **The reasons offered for said**
24 **extension include** that Mr. Kuburovich has a number of doctor appointments that require
25 follow up likely into November. He has currently scheduled visits to see his cardiologist.
26 Lastly, Mr. Kuburovich is aware that while confined he cannot run a business. The
27 additional time would allow him to complete his final business projects which is
28 necessary to fulfil financial obligations.

CONCLUSION

Based on the foregoing reasons, Defendant respectfully request that he be given until December 9, 2019 to surrender to Lompoc Federal Prison Camp.

DATED: August 28, 2019



J. DAVID NICK,
ATTORNEY FOR DEFENDANT

[PROPOSED] ORDER EXTENDING DATE TO SURRENDER

Good Cause having been shown by the defendant's ex parte application, the Court grants the defendant an extension of time to surrender from the currently set date of October 10, 2019 to _____, 2019.

So Ordered,

United States District Judge